

FILED

APR 21 2021

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUISUNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
DE'ALIZ'E JONES,)
Defendant.)

4:21CR00261 CDP/JMB

No.

MOTION FOR PRETRIAL DETENTION

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Richard N. Groeneman, Special Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with being a felon in possession of a firearm, in violation of Title 18, United States Code, Section 922.
2. On or about December 30, 2020, in the City of St. Louis, within the eastern District of Missouri, St. Louis Metropolitan Police Department ("SLMPD") officers were dispatched to 3656 Shaw for a disturbance. Officers contacted Jones in the common area of the apartment complex, and he stated to the officers that he was in an argument with his girlfriend. Jones stated that his girlfriend kicked him out of the apartment. Officers contacted Jones girlfriend and observed a lacerated lip, a bloody nose, and a large bruise on her forehead. Jones girlfriend stated that she didn't know what

happened. SLMPD officers asked her if Jones punched her and she shook her head "no." The girlfriend stated she wanted Jones to leave and he didn't want to. SLMPD officers asked Jones what was on his ankle, to which he responded, "her gun." Officers located a black Glock 17, 9mm Semi-automatic firearm with an extended magazine loaded with 20 cartridges and one cartridge in the chamber. Officers determined that Jones was a convicted felon in the State of Missouri

3. Jones' criminal history during the past five years is serious and, if released, poses a threat and danger to the community. In December of 2016, Jones pled guilty to two (2) counts of Robbery in the Second Degree, a Class B Felony, and was sentenced to a 10-year SES and placed on probation for five (5) years in case # 14SL-CR10230-01. Jones probation in case # 14SL-CR10230-01 has been suspended. In May of 2019, Jones pled guilty to Domestic Assault 2nd, a class D Felony, and was sentenced to a 5-year SES and placed on probation for 3 years in case # 18SL-CR09201-01. Jones probation in case # 18SL-CR09201-01 has been suspended. The seriousness of Defendant's criminal history, coupled with the fact that Jones continues to commit serious criminal offenses while on probation, demonstrates his inability to adhere to the requirements of his probation and orders of the court and displays a high probability that he will continue to commit criminal offenses if released pending trial.

4. Pursuant to Title 18, United States Code, Section 3142(g), the nature and circumstances of the offense charged, the weight of the evidence against defendant, the defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by defendant's release, warrant defendant's detention pending trial.

WHEREFORE, as there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community, the Government requests this Court to order Defendant detained prior to trial, and further to order a

detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

SAYLER A FLEMING
United States Attorney

/s/ Richard N. Groeneman

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